



Colorado Department of Public Health and Environment

OPERATING PERMIT

Questar Pipeline Company – Skull Creek Dew Point Plant

First Issued: June 1, 1999

Renewed: March 1, 2008

Last Revised: January 5, 2012

AIR POLLUTION CONTROL DIVISION

COLORADO OPERATING PERMIT

FACILITY NAME:	Skull Creek Dew Point Plant	OPERATING PERMIT NUMBER
FACILITY ID:	0810049	97OPMF194
RENEWED:	March 1, 2008	
EXPIRATION DATE:	March 1, 2013	
MODIFICATIONS:	See Appendix F of Permit	

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. Supp. and applicable rules and regulations.

ISSUED TO:

Questar Pipeline Company
P.O. Box 45360
Salt Lake City, UT 84145-0360

PLANT SITE LOCATION:

Section 32, T12N, R97W
Craig, Moffat County
Colorado

INFORMATION RELIED UPON

Operating Permit Application Received:	May 30, 2003
And Additional Information Received:	July 6, 2004, June 18, August 31, October 25 and November 11, 2007, June 25, 2010 & August 27, 2010. 3/29/2011. 5/17/2011

Nature of Business:	Natural Gas Transmission (Refrigeration Plant)
Primary SIC:	4922

RESPONSIBLE OFFICIAL

Name: Ms. Kim Heimsath
Title: Vice President, EH&S

FACILITY CONTACT PERSON

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SUBMITTAL DEADLINES

First Semi-Annual Monitoring Period:	March 1 – May 31
Subsequent Semi-Annual Monitoring Periods:	June 1 - November 30, December 1 - May 31
Semi-Annual Monitoring Report:	Due on July 1, 2008 & January 1, 2009 and subsequent years
First Annual Compliance Period:	March 1 – May 31
Subsequent Annual Compliance Periods:	June 1 - May 31
Annual Compliance Certification:	Due on July 1, 2008 and subsequent years

Note that the Semi-Annual Monitoring Reports and Annual Compliance Certifications must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports/certifications.

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SECTION I - General Activities and Summary

1. Permitted Activities

- 1.1 The Skull Creek Dew Point Plant contains an ethylene glycol regeneration unit, a propane refrigeration unit, a natural gas fired internal combustion engine used to drive a generator to provide electricity to the plant, one atmospheric condensate tank and associated loadout activities, and one emergency backup generator. Fugitive VOC emissions from equipment leaks exceed the APEN de minimis levels and are included as significant emission units in Section II of the permit. The purpose of the Dew Point Plant is to remove from the inlet gas sufficient amounts of heavier hydrocarbons to prevent condensation from forming in the residue gas system (lowers hydrocarbon dew point). This facility is co-located with Powder Wash Compressor Station and the two facilities are considered a single source for Title V and PSD purposes.

The facility is located in Moffat county, approximately 50 miles northwest of Craig. The facility is located at the northern tip of the Seven Mile Ridge off the dirt road running between Great Divide and Powder Wash. The area in which the plant operates is designated as attainment for all criteria pollutants. There are two affected states within 50 miles of the plant: Wyoming and Utah. The following Federal Class I designated areas are within 100 kilometers of the plant: Mount Zirkel and Flat Tops Wilderness Areas. In addition, Dinosaur National Monument is federal land within 100 kilometers of the facility. This area has been designated by the State to have the same sulfur dioxide increment as federal Class I designated areas.

- 1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.
- 1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this operating permit and shall survive reissuance. Any requirements that were designated in the compliance order on consent (No. 2006-117) signed October 29, 2007 as applicable requirements have been incorporated into this operating permit and shall survive reissuance as applicable requirements. This permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits: 90MF242 and 95MF433.
- 1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Permit Condition Number(s): Section II – Condition 1.6, Section IV - Conditions 3.d, 3.g (last paragraph), 14 and 18 (as noted). **Federal-only enforceable conditions are:** Section II – Conditions 1.7, 6.6 and 6.7.

- 1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit.

2. Alternative Operating Scenarios (ver 12/10/2008)

The following Alternative Operating Scenario (AOS) for the temporary replacement of natural gas fired reciprocating internal combustion engines has been reviewed in accordance with the requirements of Regulation No. 3., Part A, Section IV.A, Operational Flexibility-Alternative Operating Scenarios, Regulation No. 3, Part B, Construction Permits, and Regulation No. 3, Part D, Major Stationary Source New Source Review and Prevention of Significant Deterioration, and it has been found to meet all applicable substantive and procedural requirements. This permit incorporates and shall be considered a Construction Permit for any engine replacement performed in accordance with this AOS, and the permittee shall be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

2.1 Engine Replacement

The following AOS is incorporated into this permit in order to deal with a compressor engine breakdown or periodic routine maintenance and repair of an existing onsite engine that requires the use of a temporary replacement engine. "Temporary" is defined as in the same service for 90 operating days or less in any 12 month period. The 90 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day shall count as a single day towards the 90-day total. The compliance demonstrations and any periodic monitoring required by this AOS are in addition to any compliance demonstrations or periodic monitoring required by this permit.

All replacement engines are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping), and shall be subject to any shield afforded by this permit.

The results of all tests and the associated calculations required by this AOS shall be submitted to the Division within 30 calendar days of the test or within 60 days of the test if such testing is required to demonstrate compliance with NSPS or MACT requirements. Results of all tests shall be kept on site for five (5) years and made available to the Division upon request.

The permittee shall maintain a log on-site and contemporaneously record the start and stop date of any engine replacement, the manufacturer, date of manufacture, model number, horsepower, and serial number of the engine(s) that are replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine. In addition to the log, the permittee shall maintain a copy of all Applicability Reports required under section 2.1.2 and make them available to the Division upon request.

2.1.1 The permittee may temporarily replace an existing compressor engine that is subject to the emission limits set forth in this permit with an engine that is of the same manufacturer, model, and horsepower or a different manufacturer, model, or horsepower as the existing engine without modifying this permit, so long as the emissions from the temporary replacement engine comply with the emission limitations for the existing permitted engine as determined in section 2.2. Measurement of emissions from the temporary replacement engine shall be made as set forth in section 2.2.

The permittee may **temporarily** replace a grandfathered or permit exempt engine or an engine that is not subject to emission limits without modifying this permit. In this circumstance, potential annual emissions of NO_x and CO from the temporary replacement engine must be less than or equal to the potential annual emissions of NO_x and CO from the original grandfathered or permit exempt engine or for the engine that is not subject to emission limits, as determined by applying appropriate emission factors (e.g. AP-42 or manufacturer's emission factors)

2.2 Portable Analyzer Testing

Note: In some cases there may be conflicting and/or duplicative testing requirements due to overlapping Applicable Requirements. In those instances, please contact the Division Field Services Unit to discuss streamlining the testing requirements.

Note that the testing required by this Condition may be used to satisfy the periodic testing requirements specified by the permit for the relevant time period (i.e. if the permit requires quarterly portable analyzer testing, this test conducted under the AOS will serve as the quarterly test and an additional portable analyzer test is not required for another three months).

The permittee may conduct a reference method test, in lieu of the portable analyzer test required by this Condition, if approved in advance by the Division.

The permittee shall measure nitrogen oxide (NO_x) and carbon monoxide (CO) emissions in the exhaust from the replacement engine using a portable flue gas analyzer within seven (7) calendar days of commencing operation of the replacement engine.

All portable analyzer testing required by this permit shall be conducted using the Division's Portable Analyzer Monitoring Protocol (ver March 2006 or newer) as found on the Division's website at: <http://www.cdphe.state.co.us/ap/down/portanalyzeproto.pdf>

Results of the portable analyzer tests shall be used to monitor the compliance status of this unit.

For comparison with an annual (tons/year) or short term (lbs/unit of time) emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

For comparison with a short-term limit that is either input based (lb/mmBtu), output based (g/hp-hr) or concentration based (ppmvd @ 15% O₂) that the existing unit is currently subject to or the replacement engine will be subject to, the results of the test shall be converted to the appropriate units as described in the above-mentioned Portable Analyzer Monitoring Protocol document.

If the portable analyzer results indicate compliance with both the NOX and CO emission limitations, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NOX and CO emission limitations for the relevant time period.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, if the portable analyzer results fail to demonstrate compliance with either the NOX or CO emission limitations, the engine will be considered to be out of compliance from the date of the portable analyzer test until a portable analyzer test indicates compliance with both the NOX and CO emission limitations or until the engine is taken offline.

2.2.1 Additional Sources

The replacement of an existing engine with a new engine is viewed by the Division as the installation of a new emissions unit, not “routine replacement” of an existing unit. The AOS is therefore essentially an advanced construction permit review. The AOS cannot be used for additional new emission points for any site; an engine that is being installed as an entirely new emission point and not as part of an AOS-approved replacement of an existing onsite engine has to go through the appropriate Construction/Operating permitting process prior to installation.

Table 1
Internal Combustion Engine Information for the AOS

Emission Point	Replacement Engine	Periodic Monitoring?	Subject to CAM?
GEN1 AIRS 027	Caterpillar, Model G 3412 TA natural gas-fired, turbocharged, 4SRB reciprocating internal combustion engine, site rated at 607 hp at 1,800 rpm.	Quarterly	No
GEN2 AIRS 028	Cummins, Model GTA855B natural gas-fired, turbocharged, 4SRB reciprocating internal combustion engine, site rated at 354 hp at 1,800 RPM	No	No

3. Prevention of Significant Deterioration (PSD)

- 3.1 This source is located in an area designated attainment for all pollutants. Based on the information provided by the applicant, it is not categorized as a major stationary source for PSD as of the issuance date of this permit. Any future modification which is major by itself (Potential to Emit of ≥ 250 tons/yr) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 may result in the application of the PSD review requirements.

In addition, future modifications at this facility may result in the facility being classified as a major stationary source for PSD. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part D, Section II.A.26 and 42) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.42 may result in the application of the PSD review requirements.

- 3.2 The following Operating Permits are associated with this source for purposes of determining applicability of Prevention of Significant Deterioration regulations: 95OPMF031 (Powder Wash Compressor Station).

4. Accidental Release Prevention Program (112(r))

- 4.1 Based on the information provided by the applicant, the facility is not subject to the provisions of the Accidental Release Prevention Program (section 112(r) of the Federal Clean Air Act).

5. Compliance Assurance Monitoring (CAM)

- 5.1 The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV:

None.

6. Summary of Emission Units

6.1 The emissions units regulated by this permit are the following:

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Startup Date	Pollution Control Device
GEN1	026	GEN1	One (1) Waukesha, Model F3521GU, Serial Number 265241, natural gas-fired, naturally aspirated, 4SRB reciprocating internal combustion engine, site rated at 260 horsepower and limited to 900 RPM by the associated generator This generator will be removed upon startup of GEN1 (AIRS 027)		Non-Selective Catalytic Reduction (NSCR) and Air-Fuel Ratio Control
P503	010	S503	Key Engineering Ethylene Glycol Regenerator, Model and S/N: custom built. (Permitted at 70 MMscf/day)	1990/1991	Combustor
F701	018	S701	Fugitive VOC Emissions from Equipment Leaks	1990/1991	None
T1681	023	T1681	One (1) 400 Barrel Condensate Storage Tank, Tank No. 1681	January 2003 (replaced tank 954 which was installed 1990/1991)	None
GEN1	027	GEN1	One (1) Caterpillar, Model G3412TA, Serial Number CTP02768, natural gas-fired, turbocharged, 4SRB reciprocating internal combustion engine, site rated at 607 horsepower at 1,800 RPM.		Non-Selective Catalytic Reduction (NSCR) and Air-Fuel Ratio Control
GEN2	028	GEN2	One (1) Cummins, Model GTA855B, Serial Number 5510233, natural gas-fired, turbocharged, 4SRB reciprocating internal combustion engine, site rated at 354 horsepower at 1,800 RPM This engine is used for emergency back-up power.		None
TRK01	029	TRK01	Condensate Truck Loadout From Pressurized Storage Tanks		Vapor Balance

SECTION II - Specific Permit Terms

1. **GEN1 –Waukesha, Model F3521GU, Serial Number 265241, natural gas-fired, naturally aspirated, 4SRB reciprocating internal combustion engine, site rated at 260 horsepower and 900 RPM.**

This generator will be removed upon startup of GEN1 (AIRS 027) – See Section II, Condition 6.

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
NO _x	1.1	2.5 ton/yr	0.2594 lb/MMBtu	Recordkeeping and Calculation	Monthly
CO		5.0 ton/yr	0.5187 lb/MMBtu		
Natural Gas Consumption	1.2	17.5 MMscf/yr		Fuel Meter	Monthly
Opacity	1.3	Not to exceed 20%		Fuel Restriction – only natural gas is used as fuel	
Natural Gas Heat Content	1.4			ASTM Methods	Semi-annual
Control Device Parameters	1.5	See Condition 1.5		See Condition 1.5	
Statewide Controls for Oil and Gas Operations and Natural Gas-Fired Reciprocating Internal Combustion Engines	1.6			See Condition 1.6	
National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	1.7			See Condition 1.7	

- 1.1 Nitrogen Oxide (NO_x), Carbon Monoxide (CO) and Volatile Organic Compound (VOC) emissions shall not exceed the limitations stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested emissions identified in the APEN filed by the source on March 29, 2011). Compliance with the emission limitations shall be monitored as follows:

- 1.1.1 Except as provided for below, the emission factors listed above (based on Regulation No. 7, §XVII.E.2.b. emission standards, converted to lbs/MMBtu based on an applicable

engine heat rate of 8,500 Btu/hp-hr) have been approved by the Division and shall be used to calculate emissions from this engine.

Monthly emissions shall be calculated by the end of the subsequent month using the above emission factor, the monthly natural gas consumption and the higher heating value of the fuel in the equation below:

$$\frac{\text{Tons}}{\text{Month}} = \frac{\text{EF} \left(\frac{\text{lb}}{\text{MMBtu}} \right) \times \text{Fuel Use} \left(\frac{\text{MMSCF}}{\text{month}} \right) \times \text{Higher Heating Value of Fuel} \left(\frac{\text{MMBtu}}{\text{MMscf}} \right)}{2000 \left(\frac{\text{lb}}{\text{Ton}} \right)}$$

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual emission limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

If the results of the portable analyzer testing conducted under the provisions of Condition 1.1.2 show that either the NO_x or CO emission rates/factors are greater than those listed above, and in the absence of subsequent testing results to the contrary (as approved by the Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rates/factors within 60 days of the completion of the test.

- 1.1.2 Portable Monitoring shall be conducted quarterly in accordance with the requirements in Condition 5.
- 1.2 Natural Gas Consumption for this engine shall not exceed the limitations stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested fuel use in the APEN filed by the source on March 29, 2011 and a BSCF of 8500 Btu/hp-hr and a fuel heat value of 1107 btu/scf). Natural gas use shall be recorded monthly using the engine's fuel meter. Monthly natural gas use shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous months' data.
- 1.3 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant which is in excess of 20% opacity (Colorado Regulation No. 1, Section A.II.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this engine.
- 1.4 The Btu content of the natural gas used to fuel this engine shall be verified semi-annually using the appropriate ASTM Methods or equivalent, if approved in advance by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions shall be made using the heat content derived from the most recent required analysis.

- 1.5 Parameters associated with the Non-Selective Catalyst Reduction system shall be monitored as follows:
 - 1.5.1 The inlet temperature to the catalyst shall be maintained within the range of 750°F to 1250°F. Catalyst inlet temperature shall be monitored and recorded on a daily basis. If the temperature is outside of this range the appropriate maintenance activities shall be performed.
 - 1.5.2 The pressure drop across the catalyst shall not exceed 2 inches of water column from the baseline value established by the source when the engine is operating at maximum achievable load. This baseline pressure drop shall be established by the source during each portable monitoring event required by Condition 5 or as noted below.

If the pressure is outside this range then the appropriate maintenance shall be performed to bring the pressure back into range. In lieu of maintenance the source may choose to perform a portable analyzer test of the engine to establish a new pressure drop value. If the test demonstrates that the engine is in compliance with its emission limits, the pressure drop value at which the engine is tested shall become the new baseline.
 - 1.5.3 The millivolt reading (AFR) will be monitored and recorded weekly to assess the air to fuel ratio controller operating condition. During those weeks when portable monitoring required by Condition 5 is scheduled the millivolt reading shall be monitored and recorded during the portable monitoring event. Recording of the millivolt reading shall be used to verify that the AFR controlled is operated in accordance with the manufacturer's recommendations.
 - 1.5.4 The oxygen concentration in the engine exhaust gas shall be measured and recorded during each portable monitoring event required by Condition 5.
- 1.6 This engine is subject to the control requirements for natural gas-fired reciprocating internal combustion engines under Regulation No. 7, Section XVII, included, but not limited to the following (**State-only enforceable**):
 - 1.6.1 All air pollution control equipment required by Colorado Regulation No. 7, Section XVII shall be operated and maintained pursuant to manufacturer specifications or equivalent to the extent practicable, and consistent with technological limitations and good engineering and maintenance practices. The owner or operator shall keep manufacturer specifications or equivalent on file. In addition, all such air pollution control equipment shall be adequately designed and sized to achieve the control efficiency rates required by Section XVII (Colorado Regulation No. 7, Section XVII.B.1.a)
 - 1.6.2 The owner or operator of any natural gas fired reciprocating internal combustion engine that is either constructed or relocated to the state of Colorado from another state, on or after the date listed in the table below shall operate and maintain each engine according to the manufacturer's written instructions or procedures to the extent practicable and

consistent with technological limitations and good engineering and maintenance practices over the entire life of the engine so that it achieves the following emission standards (Colorado Regulation No. 7, Section XVII.E.2.a. and XVII.E.2.b):

Maximum Engine HP	Construction or Relocation Date	Emission Standard in g/hp-hr		
		NO _x	CO	VOC
≥100HP and <500HP	January 1, 2011	1.0	2.0	0.7

- 1.7 **Beginning October 19, 2013:** This engine is subject to the requirements in 40 CFR Part 63 Subpart ZZZZ, “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines” including, but not limited to the following **(Federal-only enforceable)**:

Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

- 1.7.1 If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d of Subpart ZZZZ as follows (§63.6603(a)):

- 1.7.1.1 Item 9a: Change oil and filter every 1,440 hours of operation or annually, whichever comes first, or change the oil in accordance with the requirements of Condition 1.7.4.
- 1.7.1.2 Item 9b: Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first; and
- 1.7.1.3 Item 9c: Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

General Compliance Requirements

- 1.7.2 At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source (§63.6605(b)).

Testing and Initial Compliance Requirements

- 1.7.3 You must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop

your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions (§63.6625(e)(8)).

- 1.7.4 You have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 1.7.1.1. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 1.7.1.1. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine (§63.6625(j)).

Notifications, Reports and Records

- 1.7.5 You must report each instance in which you did not meet the requirements in Table 8 of 40 CFR 63 Subpart ZZZZ that apply to you (§63.6640(b)).
- 1.7.6 You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan (§63.6655(e)).
- 1.7.7 You must keep records as follows (§63.6660):
- 1.7.7.1 Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).
 - 1.7.7.2 As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 - 1.7.7.3 You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

Other Requirements and Information

- 1.7.8 Table 8 of 40 CFR 63, Subpart ZZZZ shows which parts of the General Provisions in §§63.1 through 63.15 apply to you (§63.6655).
- 1.8 No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to: the use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere; the use of gaseous diluents to achieve compliance with a relevant standard for visible emissions; and the fragmentation of an operation such that the operation avoids regulation by a relevant standard. (63.4(b))

2. P503 - Key Engineering Ethylene Glycol Regeneration Unit

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	2.1.		0.60 tpy	Based on Input to GLYCalc Version 4.0 or higher	Parametric	As Defined
Natural Gas Processed	2.2.		25,500 MMscf/yr		Flow Meter	Monthly
Hours/Days of Operations	2.3.		N/A		Recordkeeping	Monthly
Dehydrator Regenerator (Still) Vent Requirements	2.4.	Emissions shall be routed to a Combustor that Achieves 90% Reduction in VOC Emissions			See Condition 2.4.	
Opacity	2.5.	Less than or Equal to 20%			Fuel Restriction	Only Natural Gas is Processed

- 2.1 Volatile Organic Compound emissions shall not exceed the limitation stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested emissions identified in the APEN filed by the source on May 17, 2011). Compliance with the VOC emission limit shall be based on the following monitoring method using the comparison criteria (from Worst Case Modeled Emissions, received June 18, 2007) stipulated below:

Parameter	Value	Units	Criteria
Cold Separator Temperature	0	degrees Fahrenheit	At or Below
Cold Separator Pressure	550	pounds per square inch	At or Above
Glycol Circulation Rate	2.5	gallons per minute	At or Below
Benzene Content of Gas	334	parts per million, volume	At or Below
Toluene Content of Gas	260	parts per million, volume	At or Below
Ethyl Benzene Content of Gas	15	parts per million, volume	At or Below
Xylene Content of Gas	186	parts per million, volume	At or Below

- 2.1.1 The cold separator temperature, cold separator pressure and glycol circulation rate shall be measured and recorded daily. An average value for each of these parameters shall be calculated if any daily value during the month fails to meet the comparison criteria stipulated in the table above. The circumstances surrounding any day on which the cold separator temperature, cold separator pressure and glycol circulation rate values fail to be measured and recorded shall be described in a log to be maintained on site. Data from the last day for which data exists will be substituted for the missing values for purposes of calculating the monthly average. No data substitution is necessary for days on which the unit did not operate.

- 2.1.2 Samples of inlet gas shall be collected and analyzed (extended gas analysis) to determine C₁ to C₆, n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) once per year. Frequency will revert back to quarterly if any analysis shows a BTEX constituent above the value identified in the above table. The first quarterly sample shall be taken three months after the sample that indicated a BTEX constituent exceeded the parameters in the above table was taken. Frequency of sampling and analysis will move to semi-annually after four (4) subsequent quarterly analyses indicate BTEX constituents are at or below the values in the above table and then to annually after two (2) subsequent semi-annual analyses indicate BTEX constituents are at or below the values in the above table.
- 2.1.3 The wet gas temperature and pressure shall be measured and recorded daily. An average value for each of these parameters shall be calculated for the month, if a GLYCalc run is triggered as required by Condition 2.1.4. For any day that either the wet gas temperature or pressure fail to be recorded, data from the last day for which data exists will be substituted for the missing values for purposes of calculating the monthly average. No data substitution is necessary for days on which the unit did not operate.
- 2.1.4 If either the average cold separator temperature, average cold separator pressure, average glycol circulation rate or a concentration for a BTEX constituent do not meet the stipulated comparison criteria, the GRI GLYCalc (Version 4.0 or higher) model shall be run to determine the monthly VOC emission rate. Inputs to the model shall be the recorded average values for cold separator temperature and pressure and glycol circulation rate, gas data from the most recent required analysis (see Condition 2.1.2), the average values for the inlet gas temperature and pressure (see Condition 2.1.3) and the daily gas throughput rate (see Condition 2.2). GLYCalc model runs shall be conducted for the month(s) in which the monthly average value of a GLYCalc parameter listed in the table in Condition 2.1 was exceeded and for every month in which any BTEX constituent exceeds the values listed in Condition 2.1, beginning with the month in which the gas sample was taken which indicates the exceedance and ending in the month in which a gas sample is taken that indicates no exceedance. GLYCalc model runs shall be completed by the end of the subsequent month.
- 2.1.5 A rolling twelve month total of VOC emissions shall be maintained for the unit to monitor compliance with the annual VOC limit. For any twelve month period for which no GLYCalc runs were triggered and there were no uncontrolled emissions from the dehydrator due to combustor downtime, the twelve month rolling total of VOC emissions may be assumed to be equal to the annual VOC limit. The calculation of the twelve month rolling total of VOC emissions shall be performed for any month a GLYCalc run is triggered or when there are uncontrolled emissions from the dehydrator due to combustor downtime. If a GLYCalc run is required for any reason for a given month, the pounds per hour of emissions predicted by the model shall be multiplied by the number of hours the unit ran for that month to determine monthly VOC emissions. The monthly VOC emissions used in the rolling twelve month total for months that do not trigger a GLYCalc run shall be the number of hours the unit operated in the month multiplied by

an hourly VOC emission rate of 0.133 lbs/hr (from the APEN filed by the source on May 17, 2011, includes 90% control efficiency for the combustor). For months in which there are uncontrolled emissions from the dehydrator due to combustor downtime, monthly VOC emissions shall be number of hours the unit operated with the combustor multiplied by the VOC emission rate of 0.133 lbs/hr or the VOC emission rate predicted by the required GLYCalc run plus estimated uncontrolled emissions for the month as required by Condition 2.4.3. If the twelve month rolling total of VOC emissions exceeds the annual VOC limit, VOC emissions for the previous months must be calculated with GLYCalc using the parameters described in Condition 2.1.4 until the rolling twelve month total is in compliance with the annual VOC limitation.

- 2.2 The cubic feet of gas processed by the glycol dehydration unit shall not exceed the limitation listed above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested emissions identified in the APEN filed by the source on May 17, 2011). The gas throughput to the dehydration unit shall be recorded monthly using existing flow meters. A twelve month rolling total will be maintained to monitor compliance with the annual limitation. An average daily gas throughput rate shall be determined by dividing the monthly gas throughput by the number of operating days in the month. This average daily gas throughput rate shall be used in any required GLYCalc runs.
- 2.3 The Hours of Operation shall be monitored monthly and recorded and maintained to be made available to the Division upon request. The hours of operation shall be used to calculate the monthly emissions in any month that a GLYCalc run is required as specified in Conditions 2.1.5 and 2.1.6. The days of operation shall be used to calculate an average daily gas throughput as specified in Condition 2.2.
- 2.4 A combustor shall be installed on the glycol dehydrator, capable of achieving at least 90% control of emissions from the unit. The combustor shall be operated for the life of the dehydrator (Compliance Order on Consent, No. 2006-117, dated 10/29/07, paragraph 22). The combustor shall be meet the following requirements:
 - 2.4.1 Emissions from the dehydrator regenerator (still) vent shall be routed through a closed vent system to the combustor prior to being emitted. The combustor shall be capable of reducing VOC emissions by 90% or greater.
 - 2.4.2 The combustor shall be adequately designed and sized to achieve the control efficiency specified in condition 2.4.1 and to handle reasonably foreseeable fluctuations in emissions of VOC during normal operations. The combustor shall be operated and maintained in accordance with manufacturer's recommendations and good engineering practices.
 - 2.4.3 The combustor shall be equipped with a heat sensing monitoring device, equipped with an alarm that indicates no ignition of the flame. Records of the times and duration of all flame outages, and estimated emissions shall be maintained and made available to the

Division upon request. Estimated emissions shall be used as specified in Condition 2.1.5 to monitor compliance with the VOC emission limitations in Condition 2.1.

In the absence of credible evidence to the contrary compliance with the 90% reduction requirement shall be presumed provided that requirements in this condition are met and a control efficiency of 90% may be used in the GLYCalc runs specified in Condition 2.1.4.

- 2.5 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant which is in excess of 20% opacity (Colorado Regulation No. 1, Section II.a.1.). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be processed in the dehydrator and therefore, only natural gas is burned in the combustor.

3. F701 - Fugitive VOC Emissions from Equipment Leaks

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	3.1		10 tpy	By Component Type - EPA Protocol for Equipment Leak Estimates	Component Count, Recordkeeping, and Emission Calculations	Every Five Years, Ongoing Tally, Annually
Standards of Performance for Equipment Leaks	3.2				NSPS Subpart KKK	As Defined Below
General Provisions	3.3				NSPS General Provisions	As Defined Below

- 3.1 VOC emissions shall not exceed the limitations stated above (Colorado Construction Permit 95MF433, as modified under the provisions in Section I, Condition 1.3). Emissions shall be calculated annually using the emission factors and equations listed below.

Emission Factors (EF) for individual types of components in lb/component-hr (EPA-453/R-95-017, "EPA's Protocol for Equipment Leak Emission Estimates", Table 2.4, November 1995):

Component	Emission Factor (lbs/component-hr)	
	Gas	Light Liquid
Valves	9.9×10^{-3}	5.51×10^{-3}
Pump Seals	5.29×10^{-3}	2.87×10^{-2}
Others ¹	1.94×10^{-2}	1.65×10^{-2}
Connectors	4.4×10^{-4}	4.63×10^{-4}
Flanges	8.6×10^{-4}	2.42×10^{-4}
Open-Ended Lines	4.4×10^{-3}	3.09×10^{-3}

¹Other should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps or valves

Emissions of VOC per Component:

(Component Count) X (8760 hrs/year) X (Weight % VOC in Gas or Liquid Stream) X (Emission Factor for Component in question)

Total Fugitive VOC will be the sum of emissions for each component.

The most recent gas analysis as required under Condition 2.1.2 shall be used to determine the appropriate weight % VOC to use in the above equation. Liquids are presumed to be 100% VOC.

Records shall be kept of all component additions and deletions, and a running tally maintained. A physical hard-count of facility components shall be conducted every five years. Records of the physical hard-count shall be maintained and made available to the Division upon request.

- 3.2 This source is subject to New Source Performance Standards (NSPS) requirements of Regulation No. 6, Part A, Subpart KKK, Standards of Performance of Equipment Leaks of VOC from Onshore Natural Gas Processing Plants as follows:

3.2.1 Inspection and maintenance requirements as stated in Federal NSPS 40 CFR 60.632, 60.633 and 60.634.

3.2.2 Recordkeeping requirements as stated in federal NSPS 40 CFR 60.635.

3.2.3 Reporting requirements as stated in federal NSPS 40 CFR 60.636. Reporting under this section is to be fulfilled concurrently with Appendix B monitoring and permit deviation reporting and shall be submitted to the Division.

- 3.3 This source is subject to all NSPS requirements of Colorado Regulation No. 6, Part A, Subpart A, General Provisions (Federal 40 CFR 60.1 through 60.19). Specifically, this unit is subject to the following:

3.3.1 No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere. (§ 60.12)

3.3.2 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (§ 60.11 (d)).

4. Units T1681 - 400 BBI Condensate Storage Tank

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC Emissions	4.1.		4.75 tons/yr	17.3 lbs/bbl (0.41 lbs/gal)	Recordkeeping and Calculation	Monthly
Condensate Produced	4.2.		550 bbls/yr (23,100 gal/yr)		Recordkeeping	Monthly
E & P Tanks Run	4.3.		N/A	API E & P Tanks Version 2.0 or Higher	See Condition 4.3.	

- 4.1 VOC emissions from the condensate tank shall not exceed the above limitations (As provided for the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part C, Sections I.A.7 and III.B.7, based on the requested emissions indicated on the APEN submitted on August 31, 2007). The emission factors listed in the table above (derived from API E & P Tanks run submitted with APEN on August 31, 2007) have been approved by the Division and shall be used to calculate emissions from the condensate tank. Monthly emissions shall be calculated by the end of the subsequent month using the above emission factors and the monthly quantity of condensate produced in the following equation:

$$\text{Tons/mo} = \frac{[\text{EF (lbs/bbl)} \times \text{condensate produced (bbl/month)}]}{2000 \text{ lbs/ton}}$$

A twelve month rolling total of emissions shall be maintained and used to monitor compliance with the annual emission limitation. Each month a new twelve month total shall be calculated using the previous twelve months' data.

- 4.2 The quantity of condensate produced shall not exceed the above limitations (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part C, Sections I.A.7 and III.B.7, based on the APEN submitted on August 31, 2007). The quantity of condensate produced will be monitored and recorded monthly and used to calculate emissions monthly. A twelve month rolling total of the quantity of condensate produced shall be maintained and used to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months' data.
- 4.3 If the quantity of condensate produced exceeds 500 bbls in any twelve month period, the permittee shall calculate emissions for that period using the API E & P Tanks Version 2.0 or higher. Input parameters for the model run shall be determined as follows:
- 4.3.1 Separator temperature and pressure shall reflect average actual operating conditions over the twelve month period.

- 4.3.2 The permittee shall sample and analyze the low pressure oil for the compositional E & P Tanks input requirements. A copy of the procedures used to obtain and analyze samples shall be maintained and made available to the Division upon request.
- 4.3.3 The sales condensate shall be sampled and analyzed to determine the Reid vapor pressure (RVP) and API gravity. A copy of the procedures used to obtain and analyze samples shall be maintained and made available to the Division upon request.

5. Portable Monitoring (6/1/2006 version)

Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) shall be conducted quarterly using a portable flue gas analyzer. At least one calendar month shall separate the quarterly tests. Note that if the engine is operated for less than 100 hrs in any quarterly period, then the portable monitoring requirements do not apply.

All portable analyzer testing required by this permit shall be conducted using the Division's Portable Analyzer Monitoring Protocol (ver March 2006 or newer) as found on the Division's website at: <http://www.cdphe.state.co.us/ap/down/portanalyzeproto.pdf>

Results of the portable analyzer tests shall be used to monitor the compliance status of this unit. For comparison with an annual or short term emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

If the portable analyzer results indicate compliance with both the NO_x and CO emission limitations, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NO_x and CO emission limitations for the relevant time period.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, if the portable analyzer results fail to demonstrate compliance with either the NO_x or CO emission limitations, the engine will be considered to be out of compliance from the date of the portable analyzer test until a portable analyzer test indicates compliance with both the NO_x and CO emission limitations or until the engine is taken offline.

For comparison with the emission rates/factors, the emission rates/factors determined by the portable analyzer tests and approved by the Division shall be converted to the same units as the emission rates/factors in the permit. If the portable analyzer tests shows that either the NO_x or CO emission rates/factors are greater than the relevant ones set forth in the permit, and in the absence of subsequent testing results to the contrary (as approved by the Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rate/factor within 60 days of the completion of the test.

Results of all tests conducted shall be kept on site and made available to the Division upon request.

6. GEN1 – Caterpillar, Model G3412TA, Serial Number CTP02768, natural gas-fired, turbocharged, 4SRB reciprocating internal combustion engine, site rated at 607 horsepower at 1800 RPM.

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
NO _x	6.1	5.86 ton/yr	0.3004 lb/MMBtu	Recordkeeping and Calculation Portable Flue Gas Analyzer Compliance Test	Monthly
CO		11.72 ton/yr	0.6007 lb/MMBtu		Quarterly
VOC		4.10 ton/yr	0.2102 lb/MMBtu		As Defined
Natural Gas Consumption	6.2	35.3 MMscf/yr		Fuel Meter	Monthly
Opacity	6.3	Not to exceed 20%		Fuel Restriction – only natural gas is used as fuel	
Natural Gas Heat Content	6.4			ASTM Methods	Semi-annually
Control Device Parameters	6.5	See Condition 6.5		See Condition 6.5	
Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	6.6			See Condition 6.6	
National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	6.7			See Condition 6.7	
Replacement of Existing Unit	6.8			See Condition 6.8	
Commence Construction, Compliance and Startup Notification	6.9			See Condition 6.9	

6.1 Nitrogen Oxide (NO_x), Carbon Monoxide (CO) and Volatile Organic Compound (VOC) emissions shall not exceed the limitations stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested emissions identified in the APEN filed by the source on May 17, 2011). Compliance with the emission limitations shall be monitored as follows:

- 6.1.1 Except as provided for below, the emission factors listed above (based on the Federal New Source Performance Standards in 40 CFR 60, Subpart JJJJ, converted to lbs/MMBtu based on an applicable engine heat rate of 7,340 Btu/hp-hr) have been approved by the Division and shall be used to calculate emissions from this engine.

Monthly emissions shall be calculated by the end of the subsequent month using the above emission factor, the monthly natural gas consumption and the higher heating value of the fuel in the equation below:

$$\frac{\text{Tons}}{\text{Month}} = \frac{\text{EF} \left(\frac{\text{lb}}{\text{MMBtu}} \right) \times \text{Fuel Use} \left(\frac{\text{MMSCF}}{\text{month}} \right) \times \text{Higher Heating Value of Fuel} \left(\frac{\text{MMBtu}}{\text{MMscf}} \right)}{2000 \left(\frac{\text{lb}}{\text{Ton}} \right)}$$

A twelve-month rolling total of emissions shall be maintained to monitor compliance with the annual emission limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

If the results of the portable analyzer testing conducted under the provisions of Condition 6.1.2 show that either the NO_x or CO emission rates/factors are greater than those listed above, and in the absence of subsequent testing results to the contrary (as approved by the Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rates/factors within 60 days of the completion of the test.

- 6.1.2 Portable Monitoring shall be conducted quarterly in accordance with the requirements in Condition 5. Performance testing conducted to satisfy the requirements of Condition 6.6.2 (performance testing under 40 CFR 60 Subpart JJJJ) shall also satisfy the requirement to conduct portable monitoring for the quarter in which the Subpart JJJJ performance test occurs.
- 6.2 Natural Gas Consumption for this engine shall not exceed the limitations stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested fuel use in the APEN filed by the source on May 17, 2011 and a BSCF of 7,340 Btu/hp-hr and a fuel heat value of 1107 btu/scf). Natural gas use shall be recorded monthly using the engine's fuel meter. Monthly natural gas use shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous months' data.
- 6.3 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant which is in excess of 20% opacity (Colorado Regulation No. 1, Section A.II.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this engine.
- 6.4 The Btu content of the natural gas used to fuel this engine shall be verified semi-annually using the appropriate ASTM Methods or equivalent, if approved in advance by the Division. The Btu

content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions shall be made using the heat content derived from the most recent required analysis.

6.5 Parameters associated with the Non-Selective Catalyst Reduction system shall be monitored as follows:

6.5.1 The inlet temperature to the catalyst shall be maintained within the range of 750°F to 1250°F. Catalyst inlet temperature shall be monitored and recorded on a daily basis. If the temperature is outside of this range the appropriate maintenance activities shall be performed.

6.5.2 The pressure drop across the catalyst shall not exceed 2 inches of water column from the baseline value established by the source when the engine is operating at maximum achievable load. Pressure drop across the catalyst shall be monitored and recorded on a monthly basis. The baseline pressure drop shall be established by the source during each portable monitoring event required by Condition 5 or as noted below.

If the pressure is outside this range then the appropriate maintenance shall be performed to bring the pressure back into range. In lieu of maintenance the source may choose to perform a portable analyzer test of the engine to establish a new pressure drop value. If the test demonstrates that the engine is in compliance with its emission limits, the pressure drop value at which the engine is tested shall become the new baseline.

6.5.3 The millivolt reading (AFR) will be monitored and recorded weekly to assess the air to fuel ratio controller operating condition. During those weeks when portable monitoring required by Condition 5 is scheduled the millivolt reading shall be monitored and recorded during the portable monitoring event. Recording of the millivolt reading shall be used to verify that the AFR controlled is operated in accordance with the manufacturer's recommendations.

6.5.4 The oxygen concentration in the engine exhaust gas shall be measured and recorded during each portable monitoring event required by Condition 5.

6.6 This engine is subject to the New Source Performance Standards in 40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The following items apply (**Federal-only enforceable**):

6.6.1 Emission standards as stated in Federal NSPS 40 CFR §60.4233(e) and 40 CFR §4234. The emission standards for the engine specified on the APEN submitted to the Division on May 17, 2011 (manufacture date on or after July 1, 2007 and before July 1, 2010) are:

Engine Type and Fuel	Maximum Engine Power	Manufacture Date	Emission Standard in g/hp-hr		
			NOx	CO	VOC
Non-Emergency SI Natural Gas and Non-Emergency SI Lean Burn LPG (except lean burn 500= \geq HP<1,350)	500<= HP	July 1, 2007	2.0	4.0	1.0

- 6.6.2 If you are an owner or operator of a stationary SI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. (40 CFR §60.4243(b)(2)(ii))
- 6.6.3 Owners and operators of stationary SI ICE who conduct performance tests must follow the procedures in paragraphs 40 CFR § 60.4244.
- 6.6.4 Owners and operators of all stationary SI ICE must keep records of the following (40 CFR §60.4245(a)):
- All notifications submitted to comply with this subpart and all documentation supporting any notification.
 - Maintenance conducted on the engine.
 - If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards.
- 6.6.5 Owners and operators of stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in §60.4231 must submit an initial notification as required in §60.7(a)(1). The notification must include the information in paragraphs §60.4245(c)(1) through (5). (40 CFR §60.4245(c)).
- 6.6.6 Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed. (40 CFR §60.4245(d))
- 6.6.7 The following parts of the General Provisions in 40 CFR Part 60 Subpart A apply:
- 6.6.7.1 Performance testing requirements of 40 CFR §60.8.

6.6.7.2 No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (§60.12)

6.7 This engine is subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines in 40 CFR Part 60 Subpart ZZZZ. The following items apply (**Federal-only enforceable**):

6.7.1 An affected source that is a new or reconstructed stationary RICE located at an area source must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart JJJJ for spark ignition engines. No further requirements apply for such engines under this part (§63.6590(c)(1)).

6.8 This generator will replace the existing generator unit at this site (Waukesha Model F3521GU, Serial Number 265241, AIRS ID 081/0049/026). The existing Waukesha generator shall be removed from this facility upon start-up of this new generator. The Division shall be notified by letter upon start-up of this new generator and removal of the existing generator.

6.9 This engine is subject to requirements for commencing construction, notifications and compliance certifications as specified in Section II, Condition 9 of this permit.

7. GEN2 – Cummins, Model GTA855B, Serial Number 5510233, natural gas-fired, turbocharged, 4SRB reciprocating internal combustion engine, site rated at 354 horsepower at 1800 RPM.

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
NO _x	7.1	3.83 ton/yr	19.65 g/bhp-hr	Recordkeeping and Calculation	Monthly
Operating Hours	7.2	500 hours per year		Recordkeeping	Monthly
Opacity	7.3	Not to exceed 20%		Fuel Restriction – only natural gas is used as fuel	
Commence Construction, Compliance and Startup Notification	7.4			See Condition 7.4	

7.1 Nitrogen Oxide (NO_x) emissions shall not exceed the limitations stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested emissions identified in the APEN filed by

the source on May 17, 2011). Compliance with the emission limitations shall be monitored as follows:

- 7.1.1 Except as provided for below, the emission factors listed above (based manufacturer data, converted to lbs/MMBtu based on an applicable engine heat rate of 8,743 Btu/hp-hr) have been approved by the Division and shall be used to calculate emissions from this engine.

Monthly emissions shall be calculated by the end of the subsequent month using the above emission factor, the monthly natural gas consumption and the higher heating value of the fuel in the equation below:

$$\frac{\text{Tons}}{\text{Month}} = \frac{\text{EF} \left(\frac{\text{lb}}{\text{MMBtu}} \right) \times \text{Fuel Use} \left(\frac{\text{MMSCF}}{\text{month}} \right) \times \text{Higher Heating Value of Fuel} \left(\frac{\text{MMBtu}}{\text{MMscf}} \right)}{2000 \left(\frac{\text{lb}}{\text{Ton}} \right)}$$

A twelve-month rolling total of emissions shall be maintained to monitor compliance with the annual emission limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

- 7.2 Total operating hours for the generator shall not exceed the limitation shown above. (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the APEN filed by the source on May 17, 2011). A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data.
- 7.3 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant which is in excess of 20% opacity (Colorado Regulation No. 1, Section A.II.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this engine.
- 7.4 This engine is subject to requirements for commencing construction, notifications and compliance certifications as specified in Section II, Condition 9 of this permit.

8. TRK01 – Condensate Truck Loadout

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
VOC Emissions	8.1	4.61 tons per year	0.0421 lb/bbl	Recordkeeping and Calculation	Monthly
Condensate Loaded	8.2	219,000 bbl/yr		Recordkeeping	For Each Truck Loading Activity

- 8.1 Volatile Organic Compound (VOC) emissions shall not exceed the limitations stated above. Compliance with the emission limitations shall be monitored as follows (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the the APEN filed by the source on May 17, 2011):

Monthly emissions shall be calculated by the end of the subsequent month using the above emission factor and the monthly volume of condensate loaded in the equation below:

$$\frac{\text{Tons}}{\text{Month}} = \frac{\text{EF} \left(\frac{\text{lb}}{\text{bbl}} \right) \times \text{Condensate Loaded} \left(\frac{\text{bbl}}{\text{month}} \right)}{2000 \left(\frac{\text{lb}}{\text{Ton}} \right)}$$

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual emission limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

- 8.2 The quantity of condensate loaded into trucks shall not exceed the limitations stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the the APEN filed by the source on May 17, 2011). The quantity of condensate loaded into trucks shall be monitored and recorded for each truck loading event and used to calculate emissions as required by Condition 7.1. Monthly condensate loaded shall be used in a twelve month rolling total to monitor compliance with the annual limitation.

9. Commencement of Construction – GEN1 and GEN2

- 9.1 The permit conditions in Sections II.6 and II.7 of this permit, shall expire if construction does not commence within 18 months of revised permit issuance [October 20, 2011]; construction is discontinued for a period of 18 months or more; or construction is not completed within a reasonable time of the estimated completion date (Colorado Regulation No. 3, Part B, Section III.F.4.a.(i) thru (ii)).
- 9.2 A permitted entity shall notify the Division within 15 days of commencement of any activity for which a construction permit was issued (C.R.S. § 25-7-114.5(12)(a)).
- 9.3 Within one hundred eighty (180) calendar days after commencement of operation, the permittee shall certify compliance with the conditions in this Sections II.6 and II.7 of this permit (Colorado Regulation No. 3, Part B, Section III.G.2). Submittal of the first required semi-annual monitoring report (Appendix B), after startup of this unit shall serve as the self-certification that the newly installed engines can comply with the conditions in Sections II.6 and II.7 of this permit.

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, ' ' I.A.4, V.D., & XIII.B and ' 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based upon the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.

None.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

- 2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;
- 2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;
- 2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;
- 2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.
- 2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

3. Streamlined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

No conditions have been streamlined.

SECTION IV - General Permit Conditions

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.& e. and V.C.17.

- a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.
- c. Compliance certifications shall contain:
 - (i) the identification of each permit term and condition that is the basis of the certification;
 - (ii) the compliance status of the source;
 - (iii) whether compliance was continuous or intermittent;
 - (iv) method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.
- d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.
- e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II.E., II.F., II.I, and II.J

- a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

- (i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;
- (ii) approves the use of an equivalent method;
- (iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or
- (iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

- (i) Sampling ports adequate for test methods applicable to such facility;
- (ii) Safe sampling platform(s);
- (iii) Safe access to sampling platform(s); and
- (iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Affirmative Defense Provision for Excess Emissions during Malfunctions

Note that until such time as the U.S. EPA approves this provision into the Colorado State Implementation Plan (SIP), it shall be enforceable only by the State.

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of evidence that:

- (i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;
- (ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;
- (iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;
- (iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;
- (v) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality;
- (vi) All emissions monitoring systems were kept in operation (if at all possible);
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence;
- (viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- (ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement; and
- (x) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but

not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

- (i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;
- (ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;
- (iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;
- (v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;
- (vi) All emissions monitoring systems were kept in operation (if at all possible);
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,
- (viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall

submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants, or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment

4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d. and § 25-7-122.1(2), C.R.S.

- a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.
- b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.
- d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.
- e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.
- f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and
 - (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. the permitted facility was at the time being properly operated;
- c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

6. Emission Standards for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "emission standards for asbestos."

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

8. Fee Payment

C.R.S. §§ 25-7-114.1(6) and 25-7-114.7

- a. The permittee shall pay an annual emissions fee in accordance with the provisions of § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.
- b. The permittee shall pay a permit processing fee in accordance with the provisions of § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.
- c. The permittee shall pay an APEN fee in accordance with the provisions of § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

- a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;
- b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;
- d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

14. Odor

Regulation No. 2, 5 CCR 1001-2, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.-II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

- a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.
- b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

“Prompt” is defined as follows:

- a. Any definition of “prompt” or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or
- b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;
 - (ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and
 - (iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.
- c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

“Prompt reporting” does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

- a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:
 - (i) date, place as defined in the Operating Permit, and time of sampling or measurements;
 - (ii) date(s) on which analyses were performed;
 - (iii) the company or entity that performed the analysis;
 - (iv) the analytical techniques or methods used;
 - (v) the results of such analysis; and
 - (vi) the operating conditions at the time of sampling or measurement.
- b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

- c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.
- d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.
- e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

- a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.
- b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.
- c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.
- d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

- a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.
- b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

- a. For sources located in an ozone non-attainment area or the Denver Metro Attainment Maintenance Area, all storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be

transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

- b. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.
- c. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

OPERATING PERMIT APPENDICES

- A - INSPECTION INFORMATION
- B – MONITORING AND PERMIT DEVIATION REPORT
- C - COMPLIANCE CERTIFICATION REPORT
- D - NOTIFICATION ADDRESSES
- E - PERMIT ACRONYMS
- F - PERMIT MODIFICATIONS
- G - NSPS KKK APPLICABILITY REPORT
- H - ENGINE AOS APPLICABILITY REPORTS

***DISCLAIMER:**

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

Directions to Plant:

The facility is located next to the town of Powder Wash, at the northern tip of the Seven Mile Ridge off the dirt road running between Great Divide and Powder Wash.

Safety Equipment Required:

Eye Protection, Hard Hat, Safety Shoes, Hearing Protection.

Facility Plot Plan:

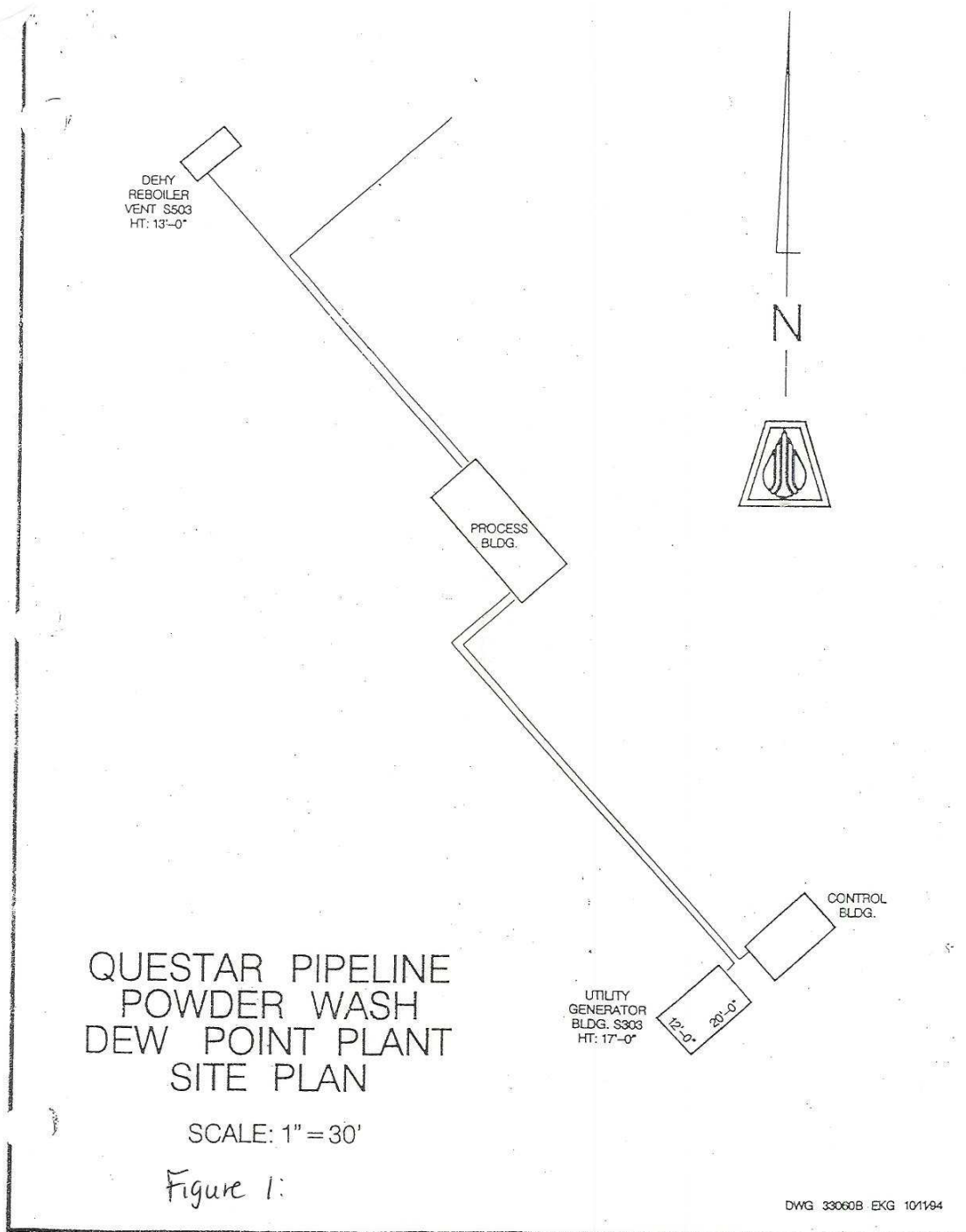
Figure 1 (following page) shows the plot plan as submitted on December 24, 1997 with the source's Title V Operating Permit Application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Insignificant activities and/or sources of emissions as submitted in the application are as follows:

Dew Point Plant Glycol Regenerator Unit Burner, P405, 0.3 MMBtu/hr.
Truck Loading of Atmospheric Condensate Tank (VOC emissions < 2 tons/yr)
Storage of Miscellaneous Chemicals for Maintenance and Operational Uses, < 5,000 gal.
Storage of Butane, Propane, and LPG, < 60,000 gal.
Startup/Shutdown in Emergency Situations.
Miscellaneous Landscaping and Site Housekeeping Devices.
Liquid Knockout Tank (subsurface)
Hot oil system with 1.65 MMBtu/hour heater



APPENDIX B

Reporting Requirements and Definitions

with codes ver 2/20/07

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

- (A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);
- (B) fails to notify or report as required under the Act; or
- (C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits. All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported “promptly”)

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit

requirements, including those attributable to malfunctions as defined in this Appendix, the probable cause of such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, “malfunction” shall refer to both emergency conditions and malfunctions. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

- (1) A situation where emissions exceed an emission limitation or standard contained in the permit;
- (2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;
- (3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,
- (4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.¹
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

Startup, Shutdown, Malfunctions and Emergencies

Understanding the application of Startup, Shutdown, Malfunctions and Emergency Provisions, is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be

¹ For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event.

considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergency Provisions

Under the Emergency provisions of Part 70 certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Monitoring and Permit Deviation Report - Part I

- Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Questar Pipeline Company – Skull Creek Dew Point Plant

OPERATING PERMIT NO: 97OPMF194

REPORTING PERIOD: _____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations Noted During Period? ¹		Deviation Code ²	Malfunction/ Emergency Condition Reported During Period?	
		YES	NO		YES	NO
GEN1 (AIRS 026)	Waukesha ICE, S/N 265241					
P503	Key Engineering Ethylene Glycol Regenerator					
F701	Fugitive VOC Emissions from Equipment Leaks					
T1681	One (1) 400 Bbl Condensate Tank					
GEN1 (AIRS 027)	Caterpillar G3412TA, S/N CTP02768					
GEN2	Cummins GTA855B					
TRK01	Condensate Truck Loadout (from Pressurized Tanks)					
	General Conditions					
	Insignificant Activities					

¹ See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

² Use the following entries as appropriate:

- 1 = Standard:** When the requirement is an emission limit or standard
- 2 = Process:** When the requirement is a production/process limit
- 3 = Monitor:** When the requirement is monitoring
- 4 = Test:** When the requirement is testing
- 5 = Maintenance:** When required maintenance is not performed
- 6 = Record:** When the requirement is recordkeeping
- 7 = Report:** When the requirement is reporting
- 8 = CAM:** A situation in which an excursion or exceedance as defined in 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
- 9 = Other:** When the deviation is not covered by any of the above categories

Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Questar Pipeline Company – Skull Creek Dew Point Plant
OPERATING PERMIT NO: 97OPMF194
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Malfunction _____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction _____
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Malfunctions/Emergencies Reported (if applicable)

Deviation Code _____

Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/06

Is the deviation being claimed as an: Emergency _____ Malfunction XX N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/06
END- 1800 4/10/06

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Malfunction/Emergencies Reported (if applicable)

5/30/06 to F. Krueger, APCD

Deviation Code _____

Division Code QA: _____

Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Questar Pipeline Company – Skull Creek Dew Point Plant

FACILITY IDENTIFICATION NUMBER: 0810049

PERMIT NUMBER: 97OPMF194

REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Printed or Typed Name

Title

Signature of Responsible Official

Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.

Operating Permit Number: 97OPMF194

First Issued: 6/1/99
Renewed: 3/1/08
Revised: January 5, 2012

APPENDIX C

Required Format for Annual Compliance Certification Reports

with codes ver 2/20/07

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Questar Pipeline Company – Skull Creek Dew Point Plant

OPERATING PERMIT NO: 97OPMF194

REPORTING PERIOD:

I. Facility Status

___ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

___ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported ¹		Monitoring Method per Permit? ²		Was Compliance - Continuous or Intermittent? ³	
		Previous	Current	YES	NO	Continuous	Intermittent
GEN1	Waukesha ICE, S/N 265241						
P503	Key Engineering Ethylene Glycol Regenerator						
F701	Fugitive VOC Emissions from Equipment Leaks						
T1681	One (1) 400 Bbl Condensate Tank						
GEN1 (AIRS 027)	Caterpillar G3412TA, S/N CTP02768						
GEN2	Cummins GTA855B						
TRK01	Condensate Truck Loadout (from Pressurized Tanks)						
	General Conditions						

Operating Permit Number: 97OPMF194

First Issued: 6/1/99
Renewed: 3/1/08
Revised: January 5, 2012

Air Pollution Control Division
Colorado Operating Permit
Compliance Certification Report

Appendix C
Page 2

Operating Permit Unit ID	Unit Description	Deviations Reported ¹		Monitoring Method per Permit? ²		Was Compliance - Continuous or Intermittent? ³	
		Previous	Current	YES	NO	Continuous	Intermittent
	Insignificant Activities ⁴						

¹ If deviations were noted in a previous deviation report, put an “X” under “previous”. If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an “X” under “current”. Mark both columns if both apply.

² Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark “no” and attach additional information/explanation.

³ Note whether the compliance status with of each term and condition provided was continuous or intermittent. “Intermittent Compliance” can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

⁴ Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

- A. This facility _____ is subject _____ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)
- B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).
1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

Printed or Typed Name

Title

Signature

Date Signed

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D

Notification Addresses

1. **Air Pollution Control Division**

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530

ATTN: Matt Burgett

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Air and Radiation Programs, 8P-AR
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/mmBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NO _x -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter

PM ₁₀ -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO ₂ -	Sulfur Dioxide
PY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F
Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
November 26, 2010	Minor	Section I, Condition 2 & New Appendix H	Added Division's Standard Language for temporary engine replacement Alternative Operating Scenario (AOS)
	Administrative	Page following Cover Page	Updated the Responsible Official Information
March 29, 2011	Minor	Section II, Condition 1	Permanent replacement of Engine P303 with Engine GEN1
		Section 1, Conditions 1.4, 6.1 & Appendices B & C	Updated Section I (General Activities and Summary) and the appendices containing the reporting formats to address the new engine
		Section II, Condition 5	Added Portable Monitoring Requirements for the new engine
October 20, 2011	Minor	Section I, Conditions 1.4, 6.1 & Appendices B & C	Updated Section I (General Activities and Summary) and the appendices containing the reporting formats to address the replacement engine, the new emergency backup engine, and truck loadout from pressurized tanks.
		Page Following Cover Page	Updated the responsible official information in accordance with a notification from the source received July 15, 2011
		Section II, Condition 6	Added a new section for the replacement generator engine (new GEN1)
		Section II, Condition 7	Added a new section for the new emergency backup generator engine (new GEN2)
		Section II, Condition 8	Added a new section for condensate loadout from pressurized tanks
		Section II, Condition 9	Added a section addressing Regulation No 3, Part B construction requirements for the new engines
		Section II, Condition 2	Updated the section on the dehydrator to address an increase in gas throughput of 10 MMscfd and updated the operating parameters for the unit.
		Appendix A	Added the hot oil system heater to the list of insignificant activities. Replaced the produced water pit with the liquid knock out tank
		Throughout	Changed the name of the facility from Powder Wash Dew Point Plant to Skull Creek Dew Point Plant
January 5, 2012	Administrative	Section II, Condition 3.1	Removed the reference to the physical hard-count conducted in 2006 because a new 5-year count has since been conducted in 2011. Included a note that the records of the hard-count are to be made available upon request.

APPENDIX G

NSPS KKK Applicability Report

Attached is the KKK applicability report submitted on November 30, 1999 by Questar Pipeline Company as required by Section II, Condition 3.2.4 of the permit.

Air Pollution Control Division
Colorado Operating Permit
NSPS KKK Applicability Report

Appendix G
Page 1

APPENDIX G
NSPS KKK Applicability Report

NSPS SUBPART KKK
STANDARDS OF PERFORMANCE FOR EQUIPMENT
LEAKS OF VOC FROM ONSHORE NATURAL GAS PROCESSING PLANTS

Powder Wash Dew Point Plant
FID: 0810049
Permit #: 97OPMF194
November 29, 1999

Determination of reporting requirements for 97OPMF194 under Subpart KKK Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. Note that Questar submitted an NSPS Subpart KKK Compliance Plan to the APCD on May 31, 1995. Questar initiated the VOC program on August 17, 1995 and has continued to comply with the Compliance Plan.

Determination of NSPS KKK requirements:

60.630

- (a)(1) Applies, since it is an onshore natural gas processing plant.
- (3) Applies, since the group of equipment, excluding compressors, is in VOC service.
- (b) Applies, since the plant was placed into operation after January 20, 1984.
- (e) Applies to portions of the field gas gathering system since they are located at the plant.

60.632

- (a) Subject to the provisions of this subpart and shall comply as soon as practical, but no later than 180 days after initial startup. **Questar initiated the NSPS Subpart KKK VOC monitoring program on August 17, 1995.**

60.482-1 Subject to parts (a) and (b) requiring that compliance be demonstrated within 180 days of equipment initial start-up. This

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- compliance shall be determined by a review of records and reports, performance test results, and inspection methods and procedures of 60.485. Part (d) applies but Powder Wash Dew Point Plant has no equipment in vacuum service.
- 60.482-2 Subject to parts (a)(1) - (2), (b)(1) - (2) and (c)(1) - (2).
- 60.482-3 Subject to part (i).
- 60.482-4 Applies but superseded by 60.633 (b).
- 60.482-5 Exempt under 60.633(c).
- 60.482-6 Subject to parts (a)(1) - (2), (b) and (c).
- 60.482-7 Applies to this facility. Valves shall be monitored monthly by methods in 485 (b) - (e). An instrument reading of 10,000 ppm or greater indicates a leak. Any valve for which a leak has not been detected for 2 successive months will be monitored the first of every quarter until a leak is detected. After detection of a leak, the valve shall be monitored monthly until a leak is not detected for 2 successive months. When a leak is detected, it shall be repaired as soon as practical but no later than 15 calendar days after detection. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- 60.482-8 Does Not Apply. Powder Wash Dew Point Plant has no equipment in heavy liquid service or pressure relief devices in light liquid service.
- 60.482-9 Applies to this facility. Delays of equipment repair allowed as specified under this subpart.
- 60.482-10 Does Not Apply. Powder Wash Dew Point Plant has no closed vent systems or control devices.

60.483 Alternative Standards

Powder Wash Dew Point Plant has elected not to use the provisions of 60.483-1 which allows alternative standards for valved by complying with an allowable percentage of leaking valves of equal to or less than 2.0 percent.

Powder Wash Dew Point Plant has elected not to use the provision of 60.483-2 which allows alternative standards for valves by skipping period(s) of leak detection and repair.

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60.633 Exceptions

- (b)(1) Applies as per 60.482-4 (a). All pressure relief valves at the Powder Wash Dew Point Plant shall be operated with no detectable emissions.
- (4) Applies to this facility. Any pressure relief device that is located in a nonfractionating plant that is monitored only by nonplant personnel may be monitored after a pressure release the next time the monitoring personnel are on site, instead of within 5 days.
- (c) Applies to this facility. As previously stated the Powder Wash Dew Point Plant is exempt from the requirements of 60.482-5.
- (d) Does Not Apply. The Powder Wash Dew Point Plant design capacity is 40 million standard cubic feet per day.
- (e) Does Not Apply. Facility is not in the Alaskan North Slope.
- (f) Does Not Apply. The compressor at the plant is not a reciprocating compressor in wet gas service..
- (g) Does Not Apply. Powder Wash Dew Point Plant has no flaring equipment.
- (h) Does Not Apply. Powder Wash Dew Point Plant has no equipment in heavy liquid service.

60.635 Record keeping Requirements

- (a) Applies to this facility. Subject to the requirements of 60.486. **Questar initiated the NSPS Subpart KKK VOC Monitoring Program on August 17, 1995.**

60.635 Record keeping Requirements

- | | |
|-----------------------|--|
| 60.482-7 | When each leak is detected as specified this provisions, the requirements of 60.486(b) and 60.486(c) apply. |
| 60.482-1 to 60.482-10 | All equipment subject to these provisions are subject to the provision of 60.486(e). |
| 60.482-7(g),(h) | All valves subject to these provisions are subject to the requirements of 60.486(f). |
| 60.486(j) | Information and data used to demonstrate that a piece of equipment is not in VOC service shall be |

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recorded in a log that is kept in a readily accessible location.

- 60.635(b)(1) When a leak has been detected a weatherproof marker shall be placed on the pressure relief device.
- (b)(2) When each leak is detected, the following information shall be kept for at least 2 years in the operational log.
- (i) the identification number of the instruments used to identify the leak, the operator identification number and the identification number of the equipment responsible for the leak.
 - (ii) the date the leak was detected and the dates of repair
 - (iii) the repair methods used to repair the leak
 - (iv) if the leak was above 10,000 ppm
 - (v) if the repair was delayed and how many days
 - (vi) signature of the owner or operator identifying and repairing the leak
 - (vii) was the leak repaired in less than 15 days after the discovery of the leak and if it was not, the reason for the delay
 - (viii) the dates of process unit shutdown that occurred to repair the leak
 - (ix) the date of successful repair of the leak
 - (x) the list of equipment identification numbers for no detectable emissions

60.636 Reporting Requirements

Questar initiated the NSPS Subpart KKK VOC Monitoring Program on August 17, 1995. The initial semiannual report was submitted on September 14, 1995.

- (a) Applies to this facility. Subject to the reporting requirement of 60.487.
- (b) Operator shall include the following information on a semi annual report in addition to the information required in 60.487(b)(1) - (4).
- (c)(1) Number of pressure relief devices for which leaks were detected
- (2) Number of pressure relief devices for which leaks were not repaired

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60.487 Reporting Requirements

- (a) Each owner or operator subject to the provision of Subpart VV shall submit semiannual reports beginning 6 months after the initial startup date.
- (b) The initial report to the administrator shall include the process unit identification and the number of equipment subject to 60.482-7, 60.482-2 and 60-482-3.
- (c) All semiannual reports shall include the following information:
 - (1) Process unit identification
 - (2) For each month:
 - (i) Number of valves for which leaks were detected under 60.482-7
 - (ii) Number of valves for which leaks were not repaired as required under 60.482-7
 - (iii-vi) Exempt under various provisions above
 - (vii) The facts that explain each delay and repair and, where appropriate, why a process unit shutdown was technically infeasible
 - (3) Date of process unit shutdowns within the semiannual reporting period
 - (4) Any new items not included in the initial list of subject equipment
- (d) If electing to comply with alternative monitoring, the administrator shall be notified of the standard selected 90 days prior to implementation
- (e) All performance tests shall be reported. The administrator shall be notified of any initial performance tests 30 days prior to testing.

CONCLUSION OF FINDINGS

In general, the Powder Wash Dew Point Plant is subject to the general monitoring for valves in gas/vapor service and pressure relief devices. Valves will be monitored monthly for leaks (readings above 10,000 ppm) except that 2 successive months without leaks shall allow the monitoring to be quarterly. Pressure relief devices have been designated as no detectable emissions and will be monitored annually for leaks (readings above 10,000 ppm). All leaking equipment will be marked with a weatherproof tag. All leaks will be repaired no later than 15 days after detection. A first attempt at repair shall be made no later than 5 calendar days after leak detection. Any changes in equipment which triggers additional requirements will be reported no later than the semiannual report. Records shall be maintained on site with the information as described under 60.635 and 60.486, above. Reports shall contain the information described under 60.636 and 60.487, above.

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Questar initiated the NSPS Subpart KKK VOC Monitoring Program on August 17, 1995. The initial semiannual report was submitted on September 14, 1995. Semiannual reports will continue to be submitted in March and September of each calendar year.

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Issued: 6/1/99

Operating Permit Number: 97OPMF194

First Issued: 6/1/99
Renewed: 3/1/08
Revised: January 5, 2012